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7

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 MARY SMITH, individually, and as
Special Administrator of the Estate of
11 JAMES PEREA,

12 Plaintiff,

13 vs.

14 CLARK COUNTY; LAS VEGAS
METROPOLITAN POLICE
DEPARTMENT; WELLPATH, LLC.;
15 DOES 1-10, in their individual capacities,

16 Defendants.
17

Case No.: 2:22-cv-00981

**STIPULATION AND ORDER TO
EXTEND THE DEADLINE TO FILE
DEFENDANT'S REPLY IN SUPPORT
OF MOTION TO DISMISS**

FIRST REQUEST

18 Pursuant to LR 6-1, the parties, by and through their respective counsel of record,
19 hereby stipulate and request that this Court extend the deadline to file Defendant Wellpath,
20 LLC's Reply in Support of Motion to Dismiss (ECF 11) in the above-captioned case
21 fourteen (14) days, up to and including October 17, 2022.

22 This Request for an extension of time is not sought for any improper purpose or
23 other purpose of delay. This request for extension is based upon the following:

24 ...

25 ...

26 ...

27 ...

28 ...

1 WHEREFORE, the parties respectfully request that this Court extend the time for
2 the

3 Defendants to file their Reply in Support of Motion to Dismiss (ECF 11) fourteen (14)
4 days from the current deadline of October 4, 2022 up to and including October 17, 2022.

5 Dated this 4th day of June, 2022.

Dated this 4th day of June, 2022.

6 LEWIS BRISBOIS BISGAARD & SMITH LLP

PETER GOLDSTEIN LAW CORP

7 /s/ S. Brent Vogel

/s/ Peter Goldstein

8 S. BRENT VOGEL

Peter Goldstein [SBN 6992]

9 Nevada Bar No. 006858

PETER GOLDSTEIN LAW CORP

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Las Vegas, Nevada 89118

Attorney for Plaintiffs

Attorneys for Defendant Wellpath, LLC

Mary Smith, individually, and

as Special Administrator of the

Estate of James Perea

13 **ORDER**

14 IT IS SO ORDERED.

15 Dated October 5, 2022.

16
17
18 *James C. Mahan*
UNITED STATES DISTRICT JUDGE

From: [Peter Goldstein](#)
To: [Brown, Heidi](#)
Cc: [Rourke, Robert](#); [Vogel, Brent](#); [San Juan, Maria](#)
Subject: Re: [EXT] Re: Perea v. Wellpath - Case No. 2:22-cv-00981
Date: Tuesday, October 4, 2022 3:43:50 PM
Attachments: [image001.png](#)



I will send an email to Lyssa Anderson who represents LVMPD and we can all coordinate dates and times.
The SAO is fine to file with my e-sig.

Peter



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On Tue, Oct 4, 2022 at 3:29 PM Brown, Heidi <Heidi.Brown@lewisbrisbois.com> wrote:

Dear Mr. Goldstein,

Please see the attached revised stipulation. As to the discussion regarding discovery, what times do you have available this week for a conference with Mr. Rourke? Thank you.



**LEWIS
BRISBOIS**

Heidi Brown

Legal Secretary to

Adam Garth

Robert Rourke

Martin Manke

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From: Peter Goldstein <peter@petergoldsteinlaw.com>

Sent: Tuesday, October 4, 2022 3:23 PM

To: Brown, Heidi <Heidi.Brown@lewisbrisbois.com>

Cc: Rourke, Robert <Robert.Rourke@lewisbrisbois.com>; Vogel, Brent
<Brent.Vogel@lewisbrisbois.com>; San Juan, Maria <Maria.SanJuan@lewisbrisbois.com>

Subject: [EXT] Re: Perea v. Wellpath - Case No. 2:22-cv-00981

looks good except wrong firm name above my signature, if you can fix that and we have to discuss the discovery plan/scheduling order due on october 14.

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On Tue, Oct 4, 2022 at 2:55 PM Brown, Heidi <Heidi.Brown@lewisbrisbois.com> wrote:

Dear Mr. Goldstein,

Attached for your review and approval is the stipulation to extend our reply deadline to the motion to dismiss that you spoke to Mr. Rourke about yesterday. Thank you.



**LEWIS
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Legal Secretary to

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